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**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

MICHAEL GAFFNEY,

Plaintiff,

v.

MUHAMMAD ALI ENTERPRISES LLC, a New
York Limited Liability Company; AUTHENTIC
BRANDS GROUP LLC, a New York Limited
Liability Company; ROOTS OF, INC., a California
corporation d/b/a/ "ROOTS OF FIGHT;" and
DOES 1-10,

Defendants.

Civil Action Nos. 1:18-cv-08770-GBD-OTW;
1:20-cv-07113-GBD-OTW

**DEFENDANTS' NOTICE OF MOTION IN
LIMINE NO. 6 TO EXCLUDE PLAINTIFF'S
TRIAL EXHIBITS 8, 13, 32 AND 36**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law,
Declaration of Jessica S. Rutherford, Esq. and Exhibits thereto, and upon all prior papers and
pleadings herein, defendants Muhammad Ali Enterprises LLC and Authentic Brands Group LLC
("the Muhammad Ali Entities") will move this Court, before the Honorable George B. Daniels,
U.S.D.J., in Courtroom 11A at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl
St., New York, NY 10007, at the final pretrial conference on February 7, 2024 at 10:00 a.m. or

as soon thereafter as the matter can be heard, for an Order to exclude Plaintiff's Trial Exhibits 8, 13, 32, and 36.

Dated: January 24, 2024

Respectfully submitted,

By: /s/ Jessica S. Rutherford
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CERTIFICATE OF SERVICE

I hereby certify that on January 24, 2024, a true and correct copy of the foregoing MOTION IN *LIMINE* NO. 6 by DEFENDANTS MUHAMMAD ALI ENTERPRISES LLC and AUTHENTIC BRANDS GROUP LLC was filed electronically. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

/s/ Jessica S. Rutherford

Jessica S. Rutherford